

July 26, 2002

Mr. John L. Skolds, President  
and Chief Nuclear Officer  
Exelon Nuclear  
Exelon Generation Company, LLC  
200 Exelon Way, KSA 3-E  
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING PROPOSED  
ALTERNATIVE GVRR-7 ON INSERVICE TESTING OF CERTAIN CHECK  
VALVES, LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2 (TAC NOS.  
MB4804 AND MB4805)

Dear Mr. Skolds:

The Nuclear Regulatory Commission (NRC) staff is currently reviewing Exelon Generation Company's (EGC's) submittal dated April 12, 2002, with a proposed alternative associated with the second 10-year interval inservice testing program for Limerick Generating Station, Units 1 and 2.

Pursuant to the provisions of Title 10 of the *Code of Federal Regulations*, Section 50.55a(a)(3)(i), EGC appears to have requested to group certain check valves, and inspect or test at least one valve in each group, during all modes of operation. American Society of Mechanical Engineers OM Code-1990, ISTC 4.5.2, "Exercising Requirements," and Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing programs," Position 2, "Alternative to Full Flow Testing of Check Valves," paragraph (c), allow grouping of check valves only while testing at a refueling outage.

The staff has reviewed the submittal and has determined that additional information is needed in order to complete the review.

We request that you provide your response to the enclosed questions within 30 days. If you have any questions, please call John Boska at (301) 415-2901.

Sincerely,

***/RA by JBoska for/***

Christopher Gratton, Sr. Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure: As stated

cc w/encl: See next page

REQUEST FOR ADDITIONAL INFORMATION

PROPOSED ALTERNATIVE FOR TESTING OF CHECK VALVES

LIMERICK GENERATING STATION, UNITS 1 & 2

DOCKET NOS. 50-352 AND 50-353

1. Please clarify when the disassembly, inspection, and flow testing of the check valves will be performed (i.e., during all modes of plant operation, or only during plant outages [modes four or five]).
2. Please provide the following information:
  - a) the valve groupings for the check valves listed in the proposed alternative.
  - b) the correct designations for check valves 51-1(2)1116B,D.
3. Whenever any of the check valves listed in the proposed alternative are disassembled and inspected during plant operation in modes one, two or three:
  - a) will the associated emergency core cooling (ECCS) system be in a scheduled maintenance status?
  - b) will isolation, maintenance, and testing be performed using approved plant procedures, controls and in compliance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants?"
  - c) will the ECCS system alignments be controlled by plant procedures?
  - d) how long will the ECCS system be out of service for the check valve disassembly and flow test?
4. As required by 10 CFR 50.65(a)(4), "before performing maintenance activities (including but not limited to surveillance, post-maintenance testing, and corrective and preventive maintenance), the licensee shall assess and manage the increase in risk that may result from the proposed maintenance activities." What methods or processes will be used to comply with these requirements when performing disassembly and inspection of check valves as proposed in the proposed alternative? Specifically describe the following:
  - a) how risk evaluations will be used during maintenance scheduling.
  - b) how the online risk monitor will be utilized.
  - c) methods to evaluate risk for assessing activities for components not directly in the probabilistic risk assessment (PRA) model. Are the check valves listed in the relief request contained in the PRA model?
  - d) how the associated ECCS system will be handled during the check valve work (i.e., will the ECCS system associated with the check valves being disassembled be declared inoperable during check valve maintenance?)
5. Please provide the disassembly and inspection frequency for each group of check valves and the length of the cycle for checking all valves in the group. Please provide the failure rates of these check valves.

**Enclosure**

Limerick Generating Station, Units 1 & 2

cc:

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Limerick Generating Station, Units 1 & 2

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**DISTRIBUTION:**

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DATE	7/26/02	7/26/02	7/26/02

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